

AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A CRIMINAL COMPLAINT

I, Trista Adams, a Special Agent with the Federal Bureau of Investigation (“FBI”), being duly sworn, depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent (“SA”) of the Federal Bureau of Investigation (“FBI”) and have been so employed since August 2020. I am currently assigned to the Boston Division, Lowell Resident Agency. Prior to joining the FBI, I was an attorney licensed to practice in Ohio and Washington, D.C.

2. While employed by the FBI, I have investigated federal criminal violations related to, among other things, the online sexual exploitation of children, including but not limited to violations of 18 U.S.C. §§ 2252 and 2252A. I have received training in the investigation of child pornography and child exploitation and have had the opportunity to observe and review examples of child pornography (as defined in 18 U.S.C. § 2256).

3. I make this affidavit in support of a criminal complaint charging Eric Robert Johnson (“JOHNSON”), YOB 1973, of Billerica, Massachusetts, with one count of possession of child pornography, in violation of 18 U.S.C. §§ 2252A(a)(5) and (b)(2).

4. The statements in this affidavit are based on my own personal involvement in the investigation and my personal observations; information provided by other FBI Special Agents and analysts; information obtained from other individuals; my review of records; and my training, and background as a Special Agent with the FBI. This affidavit is intended to show merely that there is probable cause to secure a criminal complaint and does not set forth all of my knowledge about this matter. Where statements of others are set forth in this affidavit, they are set forth in substance and in part.

PROBABLE CAUSE

5. Based on information obtained from an investigation involving an internet-based peer-to-peer network, on February 18, 2022, federal warrants were obtained authorizing the search of JOHNSON's residence in Billerica, Massachusetts and JOHNSON's person for evidence, fruits, and instrumentalities of violations of 18 U.S.C. § 2252A. The affidavit submitted in support of that warrant is attached hereto as **Sealed Exhibit A**.

6. On February 23, 2022, at approximately 9:30 am, law enforcement executed the search warrants at JOHNSON's residence in Billerica, Massachusetts. After agents knocked and announced their presence at the front door of the residence and received no response, FBI agents made entry into the residence. It was determined that no persons were present at the residence at that time.

7. Law enforcement then conducted a search of the residence. Upon the initial search of the residence, investigators located a laptop computer and multiple hard drives and other electronic devices, including multiple hard drives that were found hidden in the ceiling. The laptop computer was located in one of the two bedrooms in the residence. The bedroom had photographs that included JOHNSON. The laptop computer was located next to the bed in the bedroom and it appeared to be on and running. The laptop computer was located next to sex offender paperwork in JOHNSON's name, as discussed in more detail herein. Also located next to the laptop was an expired driver license with JOHNSON's photograph and information. A preliminary review of the laptop revealed that the internet-based peer-to-peer network described in Sealed Attachment A was present on the device.

8. Also found in the residence under the bed in JOHNSON's bedroom where the laptop was found were two children's backpacks containing various children's clothing, including

bathing suits and a nightgown. At least three dolls were also found in the residence with the vaginal region sliced to make a hole in each doll's body where a vagina would be located. What appeared to be bodily fluids were found in at least two of the dolls. Additionally, a bag of children's clothing and children's costumes was found in the basement of the residence along with a sex toy. Diapers were also found throughout the residence.¹

9. Preliminary review of devices on scene revealed that at least one device contained images and videos depicting child pornography. For example, on a Toshiba external hard drive with serial number 94CATIZGT19B (the "TARGET DEVICE"), which was found connected to a laptop near the bed, law enforcement observed the following files:

a. File name: Pthc Rape – Girl Drugged & Raped (Creampie).rmvb.² This video is approximately 39 minutes and 47 seconds long. In the video, a pubescent female child, with minimal pubic hair and slightly developed breasts, who appears to be approximately 10-15 years old, can be seen wearing a black shirt, tan pants, and white underwear. The adult male removes the child's pants and underwear and digitally penetrates the child's vagina. The adult male then inserts his erect penis into the child's vagina. Throughout the video the child's face cannot be seen due to what appears to be a white cloth over her face and the child appears to be motionless as she lays on the bed.

b. File name: !03.avi. This video is approximately 18 minutes and 4 seconds in length. The video depicts a small pubescent female with undeveloped breasts and little

¹ To my knowledge, JOHNSON lives alone in the residence.

² Based on my training and experience, I know that PTHC stands for "preteen hard core."

to no pubic hair who appears to be approximately ten to twelve years old. The video depicts the child being penetrated orally and vaginally by an adult male penis.

c. File name: kXqWIOG.jpg. This photo shows a prepubescent female child. In the photo, the child's face cannot be seen, but based on the body features the child appears to be approximately six to ten years old. The child is pulling her underwear to the side to expose her genitals and spreading apart her labia with her fingers.

10. Law enforcement also identified a series of photographs on the TARGET DEVICE of a child with little to no pubic hair and undeveloped breasts appearing to be approximately ten to fifteen years old. The photographs show the child's vagina and anus. There are at least fifty photographs of this child.

11. Law enforcement observed evidence indicia of JOHNSON's ownership of the TARGET DEVICE, including a folder on the TARGET DEVICE with the name "Eric's Bench Tools" (JOHNSON's first name) as well as a folder referring to JOHNSON's dogs' names.

12. Pursuant to the search warrant, law enforcement seized the TARGET DEVICE and other electronic devices from the residence. Forensic review remains ongoing.

13. Prior to execution of the search warrants, agents obtained police records for JOHNSON, which indicate that he is listed as a lifetime Level 1 registered sex offender in the Commonwealth of Massachusetts. I am aware, from my review of records, that JOHNSON was convicted in 1992 in state court in New Hampshire of two counts of rape of a child with force. Information obtained from the Massachusetts Sex Offender Registry Board list the SUBJECT PREMISES as JOHNSON'S home address.


14. Prior to execution of the search warrant, agents conducted surveillance over a period beginning in approximately October. During that time frame, agents did not observe any

other adult aside from JOHNSON coming or going from the residence.

15. Based on the search of the home, I believe that JOHNSON lives there alone. The residence contains two bedrooms and one bathroom. The bedrooms each contained one bed. There was no indicia of another individual aside from JOHNSON residing at the residence. Apart from the children's clothing, belongings, and mutilated dolls in the residence, law enforcement observed only male clothing.

CONCLUSION

16. Based on the foregoing, I submit there is probable cause to believe that on or about February 23, 2022, JOHNSON knowingly possessed child pornography that had been mailed, and using any means and facility of interstate and foreign commerce shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, in violation of 18 U.S.C. § 2252A(a)(5) and (b)(1).



Special Agent Trista Adams
Federal Bureau of Investigation

Sworn before me by telephone in accordance with Fed. R. Crim. P. 4.1 this 23rd day of February, 2022.



HON. JUDITH G. DEIN
UNITED STATES MAGISTRATE JUDGE